

United States Courts
Southern District of Texas

FILED

May 08, 2025

Nathan Ochsner, Clerk of Court

UNITED STATES DISTRICT COURT
SOUTHERN DISTRICT OF TEXAS
HOUSTON DIVISION

UNITED STATES OF AMERICA

§

v.

§

CRIMINAL NO.: **4:25-cr-00233**

§

KENNETH COLLINS,
DEANGELO BURKS,
MARCO HERNANDEZ,
XZAVIER ALEX
AND
AMANDA SALCIDO,
DEFENDANTS

§

§

JUDGE **Eskridge**

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§

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§

§

INDICTMENT

THE GRAND JURY CHARGES THAT:

INTRODUCTION

At all times material to this Indictment, Valero, Amigo Mart, Matamoros Meat Market, Exxon, La Michoacana Meat Market, Supermercado Suksa, Gonzalez Meat Market, Panchos Meat Market, Sol Meat Market, Kress Food Store, and Al Baik Food mart are businesses which conduct retail purchase and sales of consumer goods which are shipped in interstate or foreign commerce and which affect interstate commerce.

COUNT ONE

Title 18, United States Code, §§ 1951(a) Conspiracy to Commit
Interference with Commerce by Robbery

From on or about November 5, 2024, through on or about December 2, 2024, in the Houston Division of the Southern District of Texas,

KENNETH COLLINS,
DEANGELO BURKS,
MARCO HERNANDEZ,
XZAVIER ALEX,
AND
AMANDA SALCIDO

defendants herein, did unlawfully conspire to obstruct, delay, and affect interstate commerce and the movement of articles and commodities in commerce by means of robbery, as the terms "commerce" and "robbery" are defined in Title 18, United States Code, §§ 1951(b)(1) and (b)(3), in that the defendants did unlawfully conspire to take and obtain the property of Valero located at 5301 Antoine, Amigo Mart located at 829 McCarty St., Matamoros Meat Market located at 647 Gazin St., Matamoros Meat Market located at 4818 Irvington, Exxon located at 9224 Eastex Freeway, La Michoacana Meat Market located at 620 Wayside Dr., Supermercado Suksa located at 2102 McCarty St., Gonzalez Meat Market located at 915 College Avenue, Panchos Meat Market located

at 6141 Griggs Rd, Sol Meat Market located at 7200 Lyons, Kress Food Mart located at 846 Kress St., and Al Baik Food Mart located at 6120 Wallisville Rd, all located in Houston, such property was in the possession and custody of an employee of the named businesses, namely, United States Currency and cigarettes, by means of actual and threatened force, violence, and fear of injury to those in lawful possession of those items.

In violation of Title 18, United States Code, §§ 1951(a).

COUNT TWO

Title 18, United States Code, §§ 1951(a) and 2- Aiding and Abetting Interference with Commerce by Robbery

On or about November 5, 2024, in the Houston Division of the Southern District of Texas,

MARCO HERNANDEZ

defendant herein, aiding and abetting others known and unknown to the Grand Jury, did unlawfully obstruct, delay, and affect interstate commerce and the movement of articles and commodities in commerce by means of robbery, as the terms "commerce" and "robbery" are defined in Title 18, United States Code, §§ 1951(b) (1) and (b) (3), in that the defendant did unlawfully take and obtain the property of Kress Food Store located at 846 Kress

St., Houston, Texas, which was in the possession and custody of an employee of Kress Food Store, namely, United States Currency, by means of actual and threatened force, violence, and fear of injury to those in lawful possession of those items.

In violation of Title 18, United States Code, §§ 1951(a) and 2.

COUNT THREE

Title 18, United States Code, §§ 924(c)(1)(A)(ii) and 2-Aiding and Abetting Brandishing of a Firearm During and in Relation to a Crime of Violence

On or about November 5, 2024, in the Houston Division of the Southern District of Texas,

MARCO HERNANDEZ

defendant herein, aiding and abetting others known and unknown to the Grand Jury did knowingly brandish a firearm, namely, a handgun, during and in relationship to a crime of violence for which he may be prosecuted in a court of the United States, that being Interference with Commerce by Robbery.

In violation of Title 18, United States Code, §§ 924(c)(1)(A)(ii) and 2.

COUNT FOUR

Title 18, United States Code, §§ 1951(a) and 2- Aiding and
Abetting Interference with Commerce by Robbery

On or about November 5, 2024, in the Houston Division of the Southern District of Texas,

MARCO HERNANDEZ

defendant herein, aiding and abetting others known and unknown to the Grand Jury, did unlawfully obstruct, delay, and affect interstate commerce and the movement of articles and commodities in commerce by means of robbery, as the terms "commerce" and "robbery" are defined in Title 18, United States Code, §§ 1951(b) (1) and (b) (3), in that the defendant did unlawfully attempt take and obtain the property of Al Baik Food Mart located at 6120 Wallisville Rd, Houston, Texas, which was in the possession and custody of an employee of Al Baik Food Mart, namely, United States Currency, by means of actual and threatened force, violence, and fear of injury to those in lawful possession of those items.

In violation of Title 18, United States Code, §§ 1951(a) and 2.

COUNT FIVE

Title 18, United States Code, §§ 1951(a) and 2- Aiding and
Abetting Interference with Commerce by Robbery

On or about November 6, 2024, in the Houston Division of the Southern District of Texas,

MARCO HERNANDEZ
AND
DEANGELO BURKS

defendants herein, aiding and abetting each other and others known and unknown to the Grand Jury, did unlawfully obstruct, delay, and affect interstate commerce and the movement of articles and commodities in commerce by means of robbery, as the terms "commerce" and "robbery" are defined in Title 18, United States Code, §§ 1951(b)(1) and (b)(3), in that the defendants did unlawfully take and obtain the property of Valero located at 5301 Antoine, Houston Texas, which was in the possession and custody of an employee of Valero, namely, United States Currency, by means of actual and threatened force, violence, and fear of injury to those in lawful possession of those items.

In violation of Title 18, United States Code, §§ 1951(a) and 2.

COUNT SIX

Title 18, United States Code, §§ 924(c)(1)(A)(ii) and 2-Aiding and Abetting Brandishing of a Firearm During and in Relation to a Crime of Violence

On or about November 6, 2024, in the Houston Division of the Southern District of Texas,

MARCO HERNANDEZ
AND
DEANGELO BURKS

defendants herein, aiding and abetting each other and others known and unknown to the Grand Jury did knowingly brandish a firearm, namely, a handgun, during and in relationship to a crime of violence for which they may be prosecuted in a court of the United States, that being Interference with Commerce by Robbery.

In violation of Title 18, United States Code, §§ 924(c)(1)(A)(ii) and 2.

COUNT SEVEN

Title 18, United States Code, §§ 1951(a) and 2- Aiding and Abetting Interference with Commerce by Robbery

On or about November 10, 2024, in the Houston Division of the Southern District of Texas,

DEANGELO BURKS

defendant herein, aiding and abetting others known and unknown to the Grand Jury, did unlawfully obstruct, delay, and affect

interstate commerce and the movement of articles and commodities in commerce by means of robbery, as the terms "commerce" and "robbery" are defined in Title 18, United States Code, §§ 1951(b) (1) and (b) (3), in that the defendant did unlawfully take and obtain the property of Amigo Mart located at 829 McCarty St., Houston Texas, which was in the possession and custody of an employee of Amigo Mart, namely, United States Currency, by means of actual and threatened force, violence, and fear of injury to those in lawful possession of those items.

In violation of Title 18, United States Code, §§ 1951(a) and 2.

COUNT EIGHT

Title 18, United States Code, §§ 924(c)(1)(A)(ii) and 2-Aiding and Abetting Brandishing of a Firearm During and in Relation to a Crime of Violence

On or about November 10, 2024, in the Houston Division of the Southern District of Texas,

DEANGELO BURKS

defendant herein, aiding and abetting others known and unknown to the Grand Jury did knowingly brandish a firearm, namely, a handgun, during and in relationship to a crime of violence for which they may be prosecuted in a court of the United States, that being Interference with Commerce by Robbery.

In violation of Title 18, United States Code, §§ 924 (c) (1) (A) (ii) and 2.

COUNT NINE

Title 18, United States Code, §§ 1951(a) and 2- Aiding and
Abetting Interference with Commerce by Robbery

On or about November 12, 2024, in the Houston Division of the Southern District of Texas,

DEANGELO BURKS,
KENNETH COLLINS,
AND
AMANDA SALCIDO

defendants herein, aiding and abetting each other and others known and unknown to the Grand Jury, did unlawfully obstruct, delay, and affect interstate commerce and the movement of articles and commodities in commerce by means of robbery, as the terms "commerce" and "robbery" are defined in Title 18, United States Code, §§ 1951(b) (1) and (b) (3), in that the defendants did unlawfully take and obtain the property of Matamoros Meat Market located at 647 Gazin, Houston Texas, which was in the possession and custody of an employee of Matamoros Meat Market, namely, United States Currency, by means of actual and threatened force, violence, and fear of injury to those in lawful possession of those items.

In violation of Title 18, United States Code, §§ 1951(a) and 2.

COUNT TEN

Title 18, United States Code, §§ 924(c)(1)(A)(ii) and 2-Aiding and Abetting Brandishing of a Firearm During and in Relation to a Crime of Violence

On or about November 12, 2024, in the Houston Division of the Southern District of Texas,

DEANGELO BURKS,
KENNETH COLLINS
AND
AMANDA SALCIDO

defendants herein, aiding and abetting each other and others known and unknown to the Grand Jury did knowingly brandish a firearm, namely, a handgun, during and in relationship to a crime of violence for which they may be prosecuted in a court of the United States, that being Interference with Commerce by Robbery.

In violation of Title 18, United States Code, §§ 924(c)(1)(A)(ii) and 2.

COUNT ELEVEN

Title 18, United States Code, §§ 1951(a) and 2- Aiding and Abetting Interference with Commerce by Robbery

On or about November 12, 2024, in the Houston Division of the Southern District of Texas,

DEANGELO BURKS,
KENNETH COLLINS
AND
AMANDA SALCIDO

defendants herein, aiding and abetting each other and others known and unknown to the Grand Jury, did unlawfully obstruct, delay, and affect interstate commerce and the movement of articles and commodities in commerce by means of robbery, as the terms "commerce" and "robbery" are defined in Title 18, United States Code, §§ 1951(b)(1) and (b)(3), in that the defendants did unlawfully take and obtain the property of Matamoros Meat Market located at 4848 Irvington, Houston, Texas, which was in the possession and custody of an employee of Matamoros Meat Market, namely, United States Currency, by means of actual and threatened force, violence, and fear of injury to those in lawful possession of those items.

In violation of Title 18, United States Code, §§ 1951(a) and 2.

COUNT TWELVE

Title 18, United States Code, §§ 924(c)(1)(A)(ii) and 2-Aiding and Abetting Brandishing of a Firearm During and in Relation to a Crime of Violence

On or about November 12, 2024, in the Houston Division of the Southern District of Texas,

DEANGELO BURKS,
KENNETH COLLINS,
AND
AMANDA SALCIDO

defendants herein, aiding and abetting others known and unknown to the Grand Jury did knowingly brandish a firearm, namely, a handgun, during and in relationship to a crime of violence for which they may be prosecuted in a court of the United States, that being Interference with Commerce by Robbery.

In violation of Title 18, United States Code, §§ 924(c)(1)(A)(ii) and 2.

COUNT THIRTEEN

Title 18, United States Code, §§ 1951(a) and 2- Aiding and Abetting Interference with Commerce by Robbery

On or about November 12, 2024, in the Houston Division of the Southern District of Texas,

DEANGELO BURKS,
KENNETH COLLINS
AND
AMANDA SALCIDO

Defendants herein, aiding and abetting each other and others known and unknown to the Grand Jury, did unlawfully obstruct, delay, and affect interstate commerce and the movement of articles and commodities in commerce by means of robbery, as the terms "commerce" and "robbery" are defined in Title 18, United States

Code, §§ 1951(b)(1) and (b)(3), in that the defendants did unlawfully take and obtain the property of Exxon located at 9224 Eastex Freeway, Houston Texas, which was in the possession and custody of an employee of Exxon, namely, United States Currency, by means of actual and threatened force, violence, and fear of injury to those in lawful possession of those items.

In violation of Title 18, United States Code, §§ 1951(a) and 2.

COUNT FOURTEEN

Title 18, United States Code, §§ 924(c)(1)(A)(ii) and 2-Aiding and Abetting Brandishing of a Firearm During and in Relation to a Crime of Violence

On or about November 12, 2024, in the Houston Division of the Southern District of Texas,

DEANGELO BURKS,
KENNETH COLLINS,
AND
AMANDA SALCIDO

defendants herein, aiding and abetting each other and others known and unknown to the Grand Jury did knowingly brandish a firearm, namely, a handgun, during and in relationship to a crime of violence for which they may be prosecuted in a court of the United States, that being Interference with Commerce by Robbery.

In violation of Title 18, United States Code, §§ 924 (c) (1) (A) (ii) and 2.

COUNT FIFTEEN

Title 18, United States Code, §§ 1951(a) and 2- Aiding and
Abetting Interference with Commerce by Robbery

On or about December 1, 2024, in the Houston Division of the Southern District of Texas,

KENNETH COLLINS

defendant herein, aiding and abetting others known and unknown to the Grand Jury, did unlawfully obstruct, delay, and affect interstate commerce and the movement of articles and commodities in commerce by means of robbery, as the terms "commerce" and "robbery" are defined in Title 18, United States Code, §§ 1951(b) (1) and (b) (3), in that the defendants did unlawfully take and obtain the property of La Michoacana Meat Market located at 620 Wayside Dr., Houston Texas, which was in the possession and custody of an employee of La Michoacana Meat Market, namely, United States Currency, by means of actual and threatened force, violence, and fear of injury to those in lawful possession of those items.

In violation of Title 18, United States Code, §§ 1951(a) and 2.

COUNT SIXTEEN

Title 18, United States Code, §§ 924(c)(1)(A)(ii) and 2-Aiding and Abetting Brandishing of a Firearm During and in Relation to a Crime of Violence

On or about December 1, 2024, in the Houston Division of the Southern District of Texas,

KENNETH COLLINS

defendant herein, aiding and abetting others known and unknown to the Grand Jury did knowingly brandish a firearm, namely, a handgun, during and in relationship to a crime of violence for which they may be prosecuted in a court of the United States, that being Interference with Commerce by Robbery.

In violation of Title 18, United States Code, §§ 924(c)(1)(A)(ii) and 2.

COUNT SEVENTEEN

Title 18, United States Code, §§ 1951(a) and 2- Aiding and Abetting Interference with Commerce by Robbery

On or about December 1, 2024, in the Houston Division of the Southern District of Texas,

KENNETH COLLINS

defendant herein, aiding and abetting others known and unknown to the Grand Jury, did unlawfully obstruct, delay, and affect interstate commerce and the movement of articles and commodities

in commerce by means of robbery, as the terms "commerce" and "robbery" are defined in Title 18, United States Code, §§ 1951(b)(1) and (b)(3), in that the defendants did unlawfully take and obtain the property of Supermercado Suksa located at 2102 McCarty St., Houston Texas, which was in the possession and custody of an employee of Supermercado Suksa, namely, United States Currency, by means of actual and threatened force, violence, and fear of injury to those in lawful possession of those items.

In violation of Title 18, United States Code, §§ 1951(a) and 2.

COUNT EIGHTEEN

Title 18, United States Code, §§ 924(c)(1)(A)(ii) and 2-Aiding and Abetting Brandishing of a Firearm During and in Relation to a Crime of Violence

On or about December 1, 2024, in the Houston Division of the Southern District of Texas,

KENNETH COLLINS

defendant herein, aiding and abetting others known and unknown to the Grand Jury did knowingly brandish a firearm, namely, a handgun, during and in relationship to a crime of violence for which they may be prosecuted in a court of the United States, that being Interference with Commerce by Robbery.

In violation of Title 18, United States Code, §§ 924 (c) (1) (A) (ii) and 2.

COUNT NINETEEN

Title 18, United States Code, §§ 1951(a) and 2- Aiding and
Abetting Interference with Commerce by Robbery

On or about December 2, 2024, in the Houston Division of the Southern District of Texas,

KENNETH COLLINS,
XZVAAIER ALEX,
AND
AMANDA SALCIDO

defendants herein, aiding and abetting each other and others known and unknown to the Grand Jury, did unlawfully obstruct, delay, and affect interstate commerce and the movement of articles and commodities in commerce by means of robbery, as the terms "commerce" and "robbery" are defined in Title 18, United States Code, §§ 1951(b) (1) and (b) (3), in that the defendants did unlawfully take and obtain the property of Gonzalez Meat Market located at 915 College Ave,, Houston Texas, which was in the possession and custody of an employee of Gonzalez Meat Market, namely, United States Currency, by means of actual and threatened force, violence, and fear of injury to those in lawful possession of those items.

In violation of Title 18, United States Code, §§ 1951(a) and 2.

COUNT TWENTY

Title 18, United States Code, §§ 924(c)(1)(A)(ii) and 2-Aiding and Abetting Brandishing of a Firearm During and in Relation to a Crime of Violence

On or about December 2, 2024, in the Houston Division of the Southern District of Texas,

KENNETH COLLINS,
XZAVIER ALEX,
AND
AMANDA SALCIDO

defendants herein, aiding and abetting each other and others known and unknown to the Grand Jury did knowingly brandish a firearm, namely, a handgun, during and in relationship to a crime of violence for which they may be prosecuted in a court of the United States, that being Interference with Commerce by Robbery.

In violation of Title 18, United States Code, §§ 924(c)(1)(A)(ii) and 2.

COUNT TWENTY-ONE

Title 18, United States Code, §§ 1951(a) and 2- Aiding and Abetting Interference with Commerce by Robbery

On or about December 2, 2024, in the Houston Division of the Southern District of Texas,

KENNETH COLLINS,
XZVAIER ALEX,
AND
AMANDA SALCIDO

defendants herein, aiding and abetting each other and others known and unknown to the Grand Jury, did unlawfully obstruct, delay, and affect interstate commerce and the movement of articles and commodities in commerce by means of robbery, as the terms "commerce" and "robbery" are defined in Title 18, United States Code, §§ 1951(b)(1) and (b)(3), in that the defendants did unlawfully attempt to take and obtain the property of Panchos Meat Market located at 6141 Griggs, Houston Texas, which was in the possession and custody of an employee of Panchos Meat Market, namely, United States Currency, by means of actual and threatened force, violence, and fear of injury to those in lawful possession of those items.

In violation of Title 18, United States Code, §§ 1951(a) and 2.

COUNT TWENTY-TWO

Title 18, United States Code, §§ 1951(a) and 2- Aiding and Abetting Interference with Commerce by Robbery

On or about December 2, 2024, in the Houston Division of the Southern District of Texas,

KENNETH COLLINS,
XZVAIER ALEX,
AND
AMANDA SALCIDO

defendants herein, aiding and abetting each other and others known and unknown to the Grand Jury, did unlawfully obstruct, delay, and affect interstate commerce and the movement of articles and commodities in commerce by means of robbery, as the terms "commerce" and "robbery" are defined in Title 18, United States Code, §§ 1951(b)(1) and (b)(3), in that the defendants did unlawfully take and obtain the property of Sol Meat Market located at 7200 Lyons, Houston Texas, which was in the possession and custody of an employee of Sol Meat Market, namely, Newport Cigarettes, by means of actual and threatened force, violence, and fear of injury to those in lawful possession of those items.

In violation of Title 18, United States Code, §§ 1951(a) and 2.

COUNT TWENTY-THREE

Title 18, United States Code, §§ 924(c)(1)(A)(ii) and 2-Aiding and Abetting Brandishing of a Firearm During and in Relation to a Crime of Violence

On or about December 2, 2024, in the Houston Division of the Southern District of Texas,

KENNETH COLLINS,

XZAVIER ALEX,
AND
AMANDA SALCIDO

defendants herein, aiding and abetting each other and others known and unknown to the Grand Jury did knowingly brandish a firearm, namely, a handgun, during and in relationship to a crime of violence for which they may be prosecuted in a court of the United States, that being Interference with Commerce by Robbery.

In violation of Title 18, United States Code, §§ 924 (c) (1) (A) (ii) and 2.

A TRUE BILL:

Original Signature on File

FOREMAN OF THE GRAND JURY

NICHOLAS J. GANJEI
United States Attorney

BY: Jill J. Stotts
Jill Jenkins Stotts
Assistant United States Attorney